

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21MC102(AKH)

YOSEF KUDMAN, (AND WIFE, LEAH KUDMAN),

08CV2643(AKH)

Plaintiff(s),

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

**NOTICE OF ADOPTION BY  
MAYORE ESTATES LLC, 80  
LAFAYETTE ASSOCIATES  
LLC, MAYORE ESTATES  
LLC, and 80 LAFAYETTE  
ASSOCIATION LLC, AS  
TENANTS IN COMMON OF  
ANSWER TO MASTER  
COMPLAINT**

---

**PLEASE TAKE NOTICE** that defendant **NOTICE OF ADOPTION BY MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON** for the building located at 22 Cortlandt Street (Subcellar Floors 1, 2, 3, and Floors 1, 2, 3) New York, New York 10007, (hereinafter “Mayore Estates/80 Lafayette”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Mayore Estates/80 Lafayette’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **MAYORE ESTATES/80 LAFAYETTE** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

**PLEASE TAKE FURTHER NOTICE THAT** defendant, Mayore Estates/80 Lafayette reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (§§ D(1)-(5)).

**WHEREFORE**, Mayore Estates/80 Lafayette demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
April 26, 2008

**HARRIS BEACH PLLC**

*Attorneys for Defendant*

**MAYORE ESTATES LLC, 80 LAFAYETTE  
ASSOCIATES LLC, MAYORE ESTATES  
LLC, and 80 LAFAYETTE ASSOCIATION  
LLC, AS TENANTS IN COMMON**

\_\_\_\_\_  
/s/

Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
***Attorneys for Plaintiff***

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
***Liaison Counsel for Plaintiff***

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.

Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102  
***Liaison Counsel for the Defendants***

**All Counsel via ECF**

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on April 26, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Adoption by Mayore Estates LLC, 80 Lafayette Associates LLC, Mayore Estates LLC, And 80 Lafayette Association LLC, as Tenants in Common of Answer to Master Complaint.

Dated: April 26, 2008

\_\_\_\_\_  
/s/  
Stanley Goos, Esq. (SG 7062)